

September 20, 2011

Cy Ingraham, P.E.
SEH, Inc.
421 Frenette Drive
Chippewa Falls, WI 54729
(715) 720-6231

RE: Target Analyte Recommendation for Ashland, WI

Dear Mr. Ingraham:

Battelle is pleased to provide you with this list of recommended target analytes for future analytical work at the Ashland, WI site (Table 1). It is based on a preliminary risk assessment performed by SEH that identified the analytes detected in the historical data in addition to those of primary concern for regulatory compliance. This target analyte list is protective of the environment and will provide a rigorous foundation for future work at the site.

The recommended analyte list (Table 1) was revised to include compounds that are likely released from former manufactured gas plants or analytes that were not adequately characterized during past site investigations. The only analytes dropped from the original SEH list included several phthalates that were infrequently detected at low levels¹. Several target analyte list (TAL) metals were added because the historical data did not characterize them adequately. The target laboratory detection limits are based on the regulatory limits with safety factors for assuring that moisture content and other variables do not exceed the regulatory limits often. When an analyte-specific regulatory limit is undefined or the regulatory limit is high, the target laboratory detection limit was based on the recommended analytical methods used for this project. The recommended methods include:

<u>Analytical Parameter</u>	<u>Reference Method</u>	<u>Instrumentation</u>
SVOCs	EPA 8270c	GC/MS/SIM or Scan
VOCs	EPA 8260b	GC/MS/SIM or Scan
	EPA 8021b	GC/PID
Inorganics	EPA 6000 Series	ICP
	EPA 7000 Series	AA/Furnace/Other
	EPA 9010 to 14	Cyanide Techniques

¹ Phthalates are ubiquitous in the environment and not associated with the operations of a former manufactured gas plant. The historical data were consistent with laboratory contamination.

It is understood that this list can be reduced in the future when a sufficient quantity and quality of analytical data indicates that the recommended analytes do not contribute significantly to the human or ecological risk at the site. It is also understood that a modification of the recommended target analytes (Table 1) is subject to the approval of WDNR and EPA.

Please contact me if you have any questions or comments regarding this memo.

Sincerely,

A handwritten signature in dark ink, appearing to read "Stephen Emsbo-Mattingly". The signature is fluid and cursive, with a large, stylized "S" at the beginning and a circular flourish at the end.

Stephen Emsbo-Mattingly
Principal Research Scientist

cc: G. Chojnaki
M. Broses